

## EXHIBIT 100

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE EASTERN DISTRICT OF OHIO  
3           EASTERN DIVISION

4                           -   -   -

5   IN RE:   NATIONAL           :   MDL NO. 2804  
6   PRESCRIPTION OPIATE       :  
7   LITIGATION                 :

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7                                 :   CASE NO.  
8   THIS DOCUMENT               :   1:17-MD-2804  
9   RELATES TO ALL CASES:

                                 :   Hon. Dan A.  
                                 :   Polster

10                           -   -   -

                  Tuesday, November 27, 2018

11                           -   -   -

12   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
13   CONFIDENTIALITY REVIEW

14                           -   -   -

15                           Videotaped deposition of  
16   KEVIN KREUTZER, taken pursuant to notice,  
17   was held at the law offices of Reed Smith  
18   LLP, Three Logan Square, 1717 Arch  
19   Street, Suite 3100, Philadelphia,  
20   Pennsylvania 19103, beginning at 9:34  
21   a.m., on the above date, before Amanda  
22   Dee Maslynsky-Miller, a Certified  
23   Realtime Reporter.

24                           -   -   -

23                   GOLKOW LITIGATION SERVICES  
24           877.370.3377 ph | 917.591.5672 fax  
                  deps@golkow.com

1 Q. And after you were promoted,  
2 did you continue to report to Mr.  
3 Cherveney?

4 A. Yes.

5 Q. Was there any change in your  
6 job responsibilities when you became a  
7 diversion control investigator?

8 A. No. They were pretty much  
9 the same.

10 Q. You said there was a brief  
11 interruption in your employment with  
12 AmerisourceBergen.

13 What happened there?

14 A. I applied for a position for  
15 Teva Pharmaceuticals.

16 Q. When was that?

17 A. I started January 7th, I  
18 believe, of 2012.

19 Q. That's a pretty specific  
20 date.

21 Is there some reason why  
22 that date stands out to you?

23 A. I just remember the date.

24 Q. What prompted the

1           A.       No.  No, I don't.

2           Q.       If later we showed you some  
3 documents between -- e-mail  
4 correspondence between you and Ms.  
5 McGinn, do you think it would refresh  
6 your recollection about her title and her  
7 position?

8           A.       Perhaps.

9           Q.       Do you recall, when you  
10 worked at Teva Pharmaceuticals,  
11 exchanging e-mail correspondence with Ms.  
12 McGinn?

13          A.       Yes.

14          Q.       Did you report directly to  
15 her at the time?

16          A.       I did.

17          Q.       So in January 2012, you  
18 joined Teva Pharmaceuticals.

19                   And, if I recall correctly,  
20 you were applying for the division  
21 operations manager -- or diversion  
22 operations manager position, correct?

23          A.       Yes.

24          Q.       And did you succeed in

1       securing that position?

2               A.       I did.

3               Q.       And when you began working  
4       for Teva Pharmaceuticals, was your job  
5       title the same one that you applied for?

6               A.       Yes.

7               Q.       How long were you employed  
8       with Teva Pharmaceuticals?

9               A.       Three months.

10              Q.       Did you say three months?

11              A.       Yes.

12              Q.       What happened -- what  
13       happened when you left Teva  
14       Pharmaceuticals? Did you go -- what  
15       happened with your job -- those are all  
16       bad questions.

17                      What did you do after those  
18       three months?

19              A.       What did I do after those  
20       three months?

21              Q.       Yes.

22              A.       I went back to  
23       AmerisourceBergen.

24              Q.       So is it your recollection,

1 Q. Why were you trying to  
2 enhance it?

3 A. Just like with any system,  
4 you're always trying to enhance the  
5 system as it goes on.

6 Q. In 2013 -- actually, I  
7 believe we discussed earlier the time  
8 period during which you worked at Teva,  
9 and I think you said that you joined that  
10 company in 2012 and you worked there for  
11 three months.

12 Looking at the date in this  
13 e-mail, which is January 2013, does that  
14 refresh your recollection about how long  
15 you would have worked at Teva?

16 A. It does.

17 Q. So is it possible that you  
18 worked until the middle of 2013 instead  
19 of middle of 2012?

20 A. I started January 7th, as I  
21 indicated previously, but I may have said  
22 2012. So it was 2013 until April 1st,  
23 2013.

24 Q. So your recollection is that

1     you started in January 2013 instead of  
2     2012?

3             A.     That is correct.

4             Q.     Understood.

5                     And so you would have worked  
6     until approximately April of 2013?

7             A.     April 1st.

8             Q.     Okay. Understood.

9                     In the months that you  
10    worked at Teva, do you think you  
11    developed a pretty good working  
12    understanding of Teva's suspicious order  
13    monitoring system?

14                    MR. MAIER: Object to form.

15                    THE WITNESS: I felt like I  
16    had a good understanding of their  
17    system in place.

18    BY MR. CLUFF:

19             Q.     Did you feel like it was a  
20    robust system?

21                    MR. MAIER: Object to form.

22                    THE WITNESS: I felt like it  
23    was a good system that they had.

24    BY MR. CLUFF:

1 back on the record at 2:56 p.m.

2 BY MR. CLUFF:

3 Q. Mr. Kreutzer, you testified  
4 that you only worked for Teva for  
5 approximately 90 days?

6 A. Yes.

7 Q. How come you decided to  
8 leave Teva after only 90 days?

9 A. I was let go.

10 Q. Can you share the reason why  
11 you were let go?

12 A. Sure. I was let go because  
13 Colleen felt that I wasn't doing the job  
14 up to par, I guess.

15 Q. Did she express what part of  
16 the job you were not doing up to par?

17 A. She felt like I needed more  
18 assistance than I should have had. She  
19 was not -- she wasn't directly on site at  
20 all times, she was off site at another  
21 location. So I was by myself on the job,  
22 for the most part.

23 Q. Was there a specific part of  
24 your job parameters or job description



1     where she felt that -- where she  
2     identified that your performance was  
3     lacking?

4             A.     One issue was that I took it  
5     upon myself to contact a customer  
6     directly regarding an order that was  
7     pending. But I was previously told that  
8     if I had any questions of any customers  
9     that I had to go through customer  
10    service, and then customer service would  
11    then contact the customer with my  
12    questions and then relay the answers back  
13    to customer service, and then back to me.

14            Q.     And so the problem was that  
15    if you contacted the customer directly?

16            A.     Yes.

17            Q.     Was that the straw that  
18    broke the camel's back, so to speak?

19                   MR. MAIER: Object to form.

20                   THE WITNESS: I think it was  
21                   a good part of it.

22    BY MR. CLUFF:

23            Q.     Was there any other -- any  
24    other specific information that was